

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**JAMES GODSEY,**

**Plaintiff,**

**v.**

**ELITE LABOR SERVICES, LTD. d/b/a  
ELITE STAFFING, INC., and MENASHA  
PACKAGING COMPANY, LLC,**

**Defendant.**

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**Case: 1:23-cv-14708**

**Judge Lindsay C. Jenkins**

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**MOTION TO WITHDRAW AS COUNSEL**

**NOW COME** Counsel for Plaintiff, Chad W. Eisenback (“Mr. Eisenback”) and Mohammed O. Badwan (“Mr. Badwan”) of the Sulaiman Law Group, Ltd. (collectively, “Plaintiff’s Counsel”), hereby moving this Honorable Court for an order authorizing Plaintiff’s counsel to withdraw as counsel for James Godsey and in support thereof, stating as follows:

1. On October 10, 2023, Plaintiff filed the instant action seeking redress under the Americans with Disabilities Act (“ADA”) for Defendants’ discrimination on the basis of Plaintiff’s disability, Defendants’ failure to accommodate Plaintiff’s disability, and Defendants’ retaliation against Plaintiff for engaging in a protected activity under the ADA.

2. The relationship between Plaintiff and Plaintiff’s Counsel has deteriorated over the last two months.

3. Plaintiff and Plaintiff’s Counsel attempted to resolve the differences that have arisen through voluminous email exchanges between Plaintiff and Plaintiff’s counsel.

4. Mr. Eisenback has repeatedly tried contacting Plaintiff via phone to discuss his case and upcoming deadlines. However, Plaintiff has for the most part refused to communicate with Mr. Eisenback via phone or participate in his case.

5. Unfortunately, Plaintiff and Plaintiff's Counsel were unable to resolve the material differences that have arisen between them.

6. The material differences that have arisen constitute irreconcilable differences that would render it unreasonably difficult, if not impossible, for Plaintiff's Counsel to continue the representation of Plaintiff.

7. Plaintiff's Counsel is legally prohibited from disclosing further details regarding the irreconcilable differences as disclosure of the same would breach the attorney-client privilege and may be adverse to the Plaintiff's interests.

8. To the extent the Court would like more details surrounding the irreconcilable differences that have arisen, Plaintiff's Counsel will provide such details if the Plaintiff elects to waive the attorney-client privilege for the limited purpose (limited waiver) of answering the Court's inquiries regarding the irreconcilable differences that have arisen.

9. For the foregoing reasons, Plaintiff's Counsel submits that there is good cause for the Court to authorize Plaintiff's Counsel to withdraw as counsel for Plaintiff.

10. Plaintiff's Counsel discussed the relief sought herein with Plaintiff on numerous occasions and Plaintiff is aware of the filing of the instant motion.

11. Pursuant to Local Rule 83.17, the Notification of Party Contact Information is attached hereto as Exhibit "A."

12. Plaintiff respectfully request that the Court extend the discovery deadline by 90 days and grant Plaintiffs 30 days to secure local counsel.

**WHEREFORE**, Plaintiff's Counsel respectfully request that this Court enter an Order (1) authorizing Plaintiff's Counsel to withdraw as counsel for Plaintiff; (2) extend the discovery deadline by 30 days; and (3) grant Plaintiff 30 days to secure new counsel.

Dated: May 24, 2024

Respectfully submitted,

**/s/ Chad W. Eisenback**

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Chad W. Eisenback, certify that on May 24, 2024, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system and Plaintiff via electronic mail and U.S. Certified Mail to all parties of record.

**/s/ Chad W. Eisenback**

Chad W. Eisenback, Esq.